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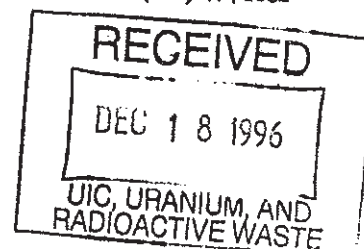
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December 16, 1996

MARY E. KELLY
Of Counsel
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REQUEST FOR (CONTESTED CASE) HEARING

Ms. Mamie Black
Acting Chief Clerk - MC105
Texas Natural Resource Conservation Commission
P.O. Box 13087
Austin, TX 78711-3087

By Fax and Mail

Subject: Application of URI, INC., Permit No. URO0305-001 - Vasquez Mine.

Dear Ms. Black:

On behalf of Charlotte Gonzalaz, I request a contested case hearing on the above referenced application. My client understands that the hearing that is being requested is more than a public meeting for submission of comments.

Ms. Gonzalez is an affected person. The proposed mining activities of URI will adversely affect her health. Ms. Gonzalez lives near the mine in Hebbronville (at 1407 W. Santa Clara).

The water supply for the City of Hebbronville is contaminated, apparently because of past uranium mining in the area. The proposed mining of URI will exacerbate the problems of contamination.

Moreover, the blowing dusts from the mine activity will adversely affect her. The release of radiation, especially combined with the past releases from other uranium mines, will add significantly to her total exposure. She has lived in the area during all past mining activities.

This request for hearing is reasonable. The request for hearing is not based solely on something other than concerns within the jurisdiction of TNRCC. The mine application is incomplete and inaccurate. It does not properly describe the ground water conditions around the mine site.

Moreover, the request is reasonable given URI's bad compliance history. The risks of contamination are increased because of the practices of URI. In addition, the compliance history of URI prepared by the staff of TNRCC is misleading. It is incomplete and inadequate. For example, recent (and potentially willful) failure by URI to report violations in association with release of contaminated waters for its injection wells at the nearby Benavides mine are not included. URI's failure to clean up the contamination from its discharges of contaminated waters from that mine into a creek are also apparently violations that are not included in the compliance history.

This request is not an effort to delay the processing of the application; it is made to provide TNRCC with facts and analysis needed by the agency to properly evaluate the application. For example, data that has been obtained in the evaluation of the contamination of the water walls(s) of the City of Hebbronville provides significant information on the potential contamination that could result from the mining of URI.

Permit No. UR 3050-001

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CHIEF CLERKS OFFICE

Ms. Black:

I do not wish to protest or request a hearing on UR's application to license its Casquero mine, and I do not wish and never intended to authorize Mr. Lawrence to represent me in connection with that application. Please take all action necessary to withdraw immediately any protest or hearing requested on this matter you may have received in my name.

Charlth Goyalg
1407 W. Santa Clara
Hebbronville, Tx 78361

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